

Alex C. Park [SBN 197781]  
LAW OFFICES OF ALEX C. PARK  
4675 Stevens Creek Blvd., Suite 100  
Santa Clara, CA 95051  
Telephone: (408) 246-1515  
Facsimile: (408) 246-4105  
Email: [alexcpark@yahoo.com](mailto:alexcpark@yahoo.com)  
Attorney for Petitioner

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JIN SANG KIM;	)	Case No. 3:17-cv-02248-LB
	)	
Petitioner,	)	SECOND STIPULATION TO
	)	CONTINUE HEARING AND
vs.	)	EXTEND TIME OF BRIEFING FOR
	)	MOTION TO DISMISS;
JOHN F. KELLY, Secretary of	)	<del>PROPOSED</del> ORDER
Department of Homeland Security;	)	<b>IT'S SO ORDERED AS MODIFIED</b>
JAMES MCCAMENT, Director of	)	Immigration Case
U.S. Citizenship and Immigration	)	
Services; and DOES 1 through 20,	)	
inclusive.	)	
	)	
Respondents.	)	
	)	

---



Petitioner, by and through the attorney of record, and Respondents, by and through their attorney of record, hereby stipulate, subject to the approval of the Court, to the following:

1. Petitioner filed this action on April 23, 2017, and served the Petition on or about June 28, 2017.
2. Respondent filed a Motion to Dismiss for Lack of Jurisdiction filed on August 28, 2017.
3. The Opposition to Motion to Dismiss for Lack of Jurisdiction was extended to be due to be filed by Petitioner on December 11, 2017. The current calendared hearing date for this motion is scheduled for January 4, 2018.
4. The parties believe that additional time for filing an opposition may facilitate resolution without the need for judicial intervention in this case. Both parties have indicated a willingness to work together to try to resolve this matter administratively, and agree that resolution will require some additional time.
5. This is the parties' second request for an extension of time, and the extension of time would affect no other deadlines in the case and is not for the purpose of undue delay.
6. The parties therefore request a continuance of the hearing date to April 26, 2018 at <sup>9:30</sup>~~9:00~~ a.m. with extension of time for filing the Opposition to Motion to Dismiss for Lack of Jurisdiction to <sup>21</sup>~~15~~ days prior to the new continued hearing date and with extension of time for filing the Reply to the Opposition to <sup>14</sup>~~10~~ days prior to the new continued hearing date in this action.



1 Dated: December 27, 2017

Respectfully submitted,

2  
3 LAW OFFICES OF ALEX C. PARK

4 /s/ Alex C. Park  
5 Alex C. Park, Attorney for Petitioner  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



1 Dated: December 27, 2017

CHAD A. READLER  
Acting Assistant Attorney General  
Civil Division

WILLIAM C. PEACHEY  
Director, Office of Immigration Litigation  
District Court Section

JEFFREY S. ROBINS  
Assistant Director

9 /s/ UBAID ul-Haq  
UBAID ul-HAQ  
Trial Attorney  
Fla. Bar. No. 87397  
U.S. Dept. of Justice, Civil Division  
Office of Immigration Litigation  
District Court Section  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 598-2445  
Facsimile: (202) 305-7000  
Email: Ubaid.ul-haq@usdoj.gov

Attorneys for Respondents



1  
2 **ORDER**

3 Pursuant to stipulation, IT IS ORDERED AS MODIFIED.  
4

5 Date: 12/28/2017  
6

7   
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
United States Magistrate Judge